

**EPA**United States Environmental Protection Agency  
Washington, DC 20460**Work Assignment**

Work Assignment Number

3-62

☐ Other ☐ Amendment Number:Contract Number  
EP-C-15-022

Contract Period 09/01/2015 To 06/30/2019

Title of Work Assignment/SF Site Name

UIC Primacy &amp; Program Review

Contractor  
Cadmus Group LLC, The

Specify Section and paragraph of Contract SOW

4.3

Purpose:



Work Assignment



Work Assignment Close-Out



Work Assignment Amendment



Incremental Funding



Work Plan Approval

Period of Performance

From 07/01/2018 To 06/30/2019

Comments

Immediate start is authorized for this work assignment but work shall not commence until 7/1/18.



Superfund

## Accounting and Appropriations Data



Non-Superfund

SFO  
(Max 2)

Note: To report additional accounting and appropriations data use EPA Form 1900-69A

Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										

## Authorized Work Assignment Ceiling

Contract Period

Cost/Fee

LOE: 0

09/01/2015 To 06/30/2019

This Action:

2,500

Total

2,500

## Work Plan / Cost Estimate Approvals

Contractor WP Dated:

Cost/Fee

LOE:

Cumulative Approved:

Cost/Fee

LOE:

Work Assignment Manager Name Lisa McWhirter

Branch/Mail Code:

Phone Number: 202-564-2317

FAX Number:

(Signature)

(Date)

Project Officer Name Nancy Parrotta

Branch/Mail Code:

Phone Number: 202-564-5260

FAX Number:

(Signature)

(Date)

Other Agency Official Name Lisa Mitchell-Flinn

Branch/Mail Code:

Phone Number: 513-487-2852

FAX Number:

(Signature)

(Date)

Contracting Official Name Angela Lower

Branch/Mail Code:

Phone Number: 513-487-2036

FAX Number:

(Signature)

(Date)

**PERFORMANCE WORK STATEMENT**  
**Cadmus Contract # EP-C-15-022**  
**Work Assignment# 3-62**  
**July 1, 2018 to June 30, 2019**

**I. ADMINISTRATIVE**

**A. Title: UIC Primacy and Program Revision Support**

**B. Work Assignment COR (WACOR):**

Lisa McWhirter  
Office of Ground Water and Drinking  
Water (OGWDW)  
1200 Pennsylvania Avenue, NW (MC:  
4606M)  
Washington, DC 20460  
202-564-2317  
202-564-3754 (fax)

**Alternate Work Assignment COR  
(WACOR):**

Jill Dean  
Office of Ground Water and Drinking Water  
(OGWDW)  
1200 Pennsylvania Avenue, NW (MC:  
4606M)  
Washington, DC 20460  
202-564-8241  
202-564-3754 (fax)

**C. Quality Assurance**

Task 3 for subtasks 3-1, 3-2, 3-3 and 3-4 in this work assignment require the use of primary and /or secondary data. Consistent with the Agency's quality assurance (QA) requirements, the contractor must supplement the Contract Level Quality Assurance Project Plan (QAPP), which has been provided by the contractor, to assure the quality of the data used under task(s) 3 for subtasks 3-1, 3-2, 3-3 and 3-4 of this work assignment. Work on this/these task(s) cannot proceed until the contractor receives notification of the SQAPP approval from the PO via e-mail. The project specific quality assurance requirements must be addressed in the work plan and monthly progress reports as specified under Task 0. below.

**D. Background**

Part 147 of the Code of Federal Regulations sets forth the applicable Underground Injection Control (UIC) programs for each state, territory, and tribe identified pursuant to the Safe Drinking Water Act (SDWA) as needing a UIC program. These UIC programs are described in Part 147 as either a state-administered program approved by the EPA or a federally-administered program promulgated by the EPA. States can apply for primary enforcement authority for their UIC program(s) under §1422 or §1425 of the SDWA. Approval of a state program is based upon a determination by the Administrator that the programs meet the requirements of §1422 and/or § 1425 of SDWA and the applicable UIC provisions of Parts 124, 144, and 146 of the Code of Federal Regulations (CFR).

While 40 CFR Part 147 identifies the UIC programs and the supporting information, 40 CFR Part 145 lays out the requirements for UIC state program submissions and what the approval, revision and program withdrawal processes are for these programs. Therefore, in order to properly implement and enforce the UIC program, EPA codifies the approvals of state primacy programs and their respective revisions in Part 147. This ensures that the UIC requirements for well classes I, II, III, IV, V, and VI for each state and tribe are federally enforceable.



As of September 7, 2011, states, tribes and territories may also apply for Class VI Primacy. Consistent with the President's CCS Task Force, approving Class VI primacy applications will be a priority. As states' Class VI primacy applications are approved by the EPA Administrator, the states' Class VI UIC programs will be codified in 40 CFR Part 147.

In addition to UIC primacy and revision applications, states will be requesting EPA approval for aquifer exemptions, which are non-substantial program revisions. These program revisions are approved by letter instead of being approved by rule and codified in Part 147. The State of California is reviewing its Class II program and will be submitting aquifer exemption requests to EPA for review and approval.

This work assignment supports the steps necessary for the contractor to provide support in evaluating a state's (states') Class VI primacy application(s) and/or a state's (states') UIC program revision(s) to be codified in Part 147 as well as non-substantial program revisions that will be approved by letter. These steps include: providing support in evaluating Class VI primacy application(s) and/or UIC §1422 and/or §1425 program revision(s) and aquifer exemption requests from the State of California.

**II. OBJECTIVE:** The contractor shall support EPA in: 1) Comparing states' §1422 programs (including Class VI); 2) Comparing states' §1425 programs; and 3) Reviewing non-substantial program revisions such as aquifer exemption requests from the State of California.

### **III. TASK DETAIL**

The contractor shall perform the following tasks:

#### **Task 0: Work Plan and Monthly Progress Reports**

The contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. In addition, the workplan shall include the requirement that all electronic and information technology (EIT) and all EIT deliverables be Section 508 compliant in accordance with the policies referenced at <http://www.epa.gov/accessibility/>. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the contractor shall include information on plans to manage work and contract costs.

In addition, the contractor shall prepare a Supplemental Project Specific Quality Assurance Project Plan (SQAPP) appending the Contract Level Quality Assurance Project Plan (QAPP), noted above, and ensure the quality of secondary data used to complete these tasks. The work plan shall explain when the SQAPP will be submitted based on the specific data requirements of the WA. This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs' broken out by the tasks in this WA.

**Deliverables:** Work plan, Supplemental Project Specific Quality Assurance Project Plan, monthly progress and financial reports.

#### **Task 1: Perform comparison of State UIC §1422 Program Regulations (Including Class VI) (PWS Section 4.3)**

**Subtask 1.1: Research Federal and State SDWA § 1422 UIC Program Regulations (Including Class VI) for up to four (4) states**

Under this work assignment, the EPA WACOR will identify up to four (4) state UIC §1422 programs that the contractor shall analyze. Some of these four (4) states may be for Classes I-V and/or Class VI or Class VI only. The contractor shall provide technical support to EPA Headquarters for the following: (1) review the state UIC §1422 program regulation text in 40 CFR Part 147 for those state(s) identified by the EPA WACOR and note the state statutory and regulatory citations codified in Part 147 for each state identified by the EPA WACOR. (2) initiate a web search to locate the state statutes and regulations for each state identified by the EPA WACOR. (3) gather these statutes and regulations electronically for each state identified by the EPA WACOR and deliver to the EPA WACOR. The WACOR will identify up to four (4) state UIC §1422 programs to be analyzed through technical direction. After receiving technical direction from the EPA WACOR, the contractor shall deliver electronically a copy of the state(s) UIC statutes and regulations to the EPA WACOR within ten (10) calendar days. The EPA WACOR will review and confirm the use of the state's UIC statutes and regulations for the crosswalk analysis in subtask 1.2 below.

**Subtask 1.2: Develop and Perform Comparison of State UIC §1422 Crosswalks (Including Class VI)**

Under this work assignment, the contractor shall use the §1422 crosswalk and/or the Class VI crosswalk to perform a detailed comparison of the state's UIC statutes and regulations. These crosswalk templates will be provided to the contractor. The contractor shall note any changes, if any, and/or any differences in the state's statutes and regulations from the federal regulations and include these notes in the crosswalk. For planning purposes, the contractor shall perform a detailed comparison of up to four (4) state UIC §1422 programs that will be identified by the EPA WACOR through technical direction. After receiving technical direction, the contractor shall deliver a crosswalk for each of the states identified to the EPA WACOR for review and comment. For planning purposes, the EPA WACOR plans to issue technical direction for each state (up to four (4)) and will stagger these technical directions throughout the performance period (e.g., one technical direction every month or two (2) months). Once the contractor receives technical direction from the EPA WACOR, the contractor shall have sixty (60) calendar days to deliver the draft crosswalk to the EPA WACOR.

**Subtask 1.3: Summarize Findings in Subtask 1.2**

Under this work assignment, the contractor shall summarize the major changes in states' regulations and statutes as well as any major differences between the states' regulations and the federal regulations in 40 CFR 124, 144, 146, and, if applicable, 148. The draft summary document shall not exceed five (5) pages and be delivered to the EPA WACOR along with the draft crosswalk. For planning purposes, the contractor shall deliver up to four (4) draft summary documents along with the draft crosswalks to be delivered under subtask 1.2 above.

**Task 2: Perform comparison of State UIC §1425 Program Regulations**

**Subtask 2.1: Research Federal and State SDWA §1425 UIC Program Regulations for up to two (2) states**

Under this work assignment, the EPA WACOR will identify up to two (2) state UIC §1425 programs that the contractor shall analyze. The contractor shall provide technical support to EPA Headquarters for the following: (1) review the state UIC §1425 program regulation text in 40 CFR Part 147 for those state(s) identified by the EPA WACOR and note the state statutory and regulatory citations codified in Part 147 for each state identified by the EPA WACOR. (2) initiate a web search to locate the state statutes and regulations for each state identified by the EPA

WACOR. (3) gather these statutes and regulations electronically for each state identified by the EPA WACOR and deliver to the EPA WACOR. The WACOR will identify up to two (2) state UIC §1425 programs to be analyzed through technical direction. After receiving technical direction from the EPA WACOR, the contractor shall deliver electronically a copy of the state(s) UIC statutes and regulations to the EPA WACOR within ten (10) calendar days. The EPA WACOR will review and confirm the use of the state's UIC statutes and regulations for the crosswalk analysis in subtask 2.2 below.

#### **Subtask 2.2: Develop and Perform Comparison of State UIC §1425 Crosswalks**

Under this work assignment, the contractor shall use the §1425 crosswalk to be provided to the contractor to perform a detailed comparison of the state's UIC statutes and regulations. The contractor shall note any changes, if any, and/or any differences in the state's statutes and regulations from the federal regulations (Guidance 19) and include these notes in the crosswalk. For planning purposes, the contractor shall perform a detailed comparison of up to two (2) state UIC §1425 programs that will be identified by the EPA WACOR through technical direction. After receiving technical direction, the contractor shall deliver a draft crosswalk for each of the states identified to the EPA WACOR for review and comment. For planning purposes, the EPA WACOR plans to issue technical direction for each state (up to two (2)) and will stagger these technical directions throughout the performance period (e.g., one technical direction every month or two (2) months). Once the contractor receives technical direction from the EPA WACOR, the contractor shall have sixty (60) calendar days to deliver the crosswalk to the EPA WACOR.

#### **Subtask 2.3: Summarize Findings in Subtask 2.2**

Under this work assignment, the contractor shall summarize the major changes in states' regulations and statutes as well as any major differences between the states' regulations and the federal regulations (Guidance 19). The draft summary document shall not exceed five (5) pages and be delivered to the EPA WACOR along with the draft crosswalk. For planning purposes, the contractor shall deliver up to two (2) draft summary documents along with the draft crosswalks to be delivered under subtask 2.2 above.

### **Task 3: Provide Non-substantial UIC Program Revision Support for Aquifer Exemption Requests from the State of California**

The State of California has SDWA §1425 primacy (or primary enforcement authority) for Class II UIC wells and has issued UIC permits for these wells. As part of the permitting process, the State of California is required to determine whether the owner/operator seeking a Class II permit will be injecting into an underground source of drinking water (USDW) as defined by the Safe Drinking Water Act. If the injection will be or currently is in a USDW, the State of California must submit an aquifer exemption package to EPA Region 9 in order to permit these Class II injection activities. Some aquifers were exempted at the time California received primacy. However, over the years many of these Class II operations have expanded and/or moved into different formations, and injection is occurring outside the boundary of the original exempted aquifers. As a result, the State of California is requesting the owners/operators of these Class II wells to submit an aquifer exemption package to continue operating in these formations. After California reviews the aquifer exemption packages and determines that the injection activities meet the aquifer exemption criteria, California will forward these aquifer exemption packages to EPA Region 9.

For planning purposes, EPA Region 9 expects to receive up to six (6) aquifer exemption packages from the State of California throughout the period of performance. Under this work assignment, the EPA WACOR will send the contractor nonsubstantial UIC program revisions for aquifer exemption packages

from the State of California. The EPA WACOR expects to send these requests to the contractor electronically.

### **Subtask 3.1: Aquifer Exemption Completeness Check and Review and Evaluation of Aquifer Exemption Requests and Supporting Documents**

Under this Task, the contractor shall use a modified aquifer exemption checklist that was developed for reviewing proposed aquifer exemption packages submitted to EPA Region 9 by the State of California. This checklist is based on the original checklist found in the EPA Water Division Directors Memo, "Enhancing Coordination and Communication with States on Review and Approval of Aquifer Exemption Requests under SDWA," dated July 24, 2014.

For each aquifer exemption package the EPA WACOR receives from the State of California and forwards to the contractor, the contractor shall use the modified checklist described above and compare the aquifer exemption package to that checklist and determine whether the State of California has submitted a complete aquifer exemption package. In addition, the contractor shall determine whether the information provided by the State of California is adequate to substantiate the aquifer exemption packages. To make this determination, the Contractor shall review and evaluate the data, modeling results, and analyses submitted by the State of California to support its recommendation(s) to EPA to approve the aquifer exemption packages. In the summary memo, the contractor shall also make recommendations for EPA to request from the State of California additional data that may be missing and/or insufficient to support the conclusions in the aquifer exemption package(s).

EPA Region 9 expects to receive up to six (6) aquifer exemption packages from the State of California. The EPA WACOR will forward these aquifer exemption packages electronically to the contractor. For planning purposes, the contractor shall summarize the completeness check and provide a detailed review of the aquifer exemption packages and develop a report or memo not to exceed ten (10) pages per aquifer exemption package and deliver the report to the EPA WACOR within ten (10) business days of receipt of the aquifer exemption package. The contractor shall expect to deliver up to six (6) ten-page summary reports.

### **Subtask 3.2: Provide Technical Support in Developing Record of Decision Letters for Approving or Denying Aquifer Exemption Requests**

Under this Task, the EPA WACOR will request contractor support in drafting the record of decision letter that will provide EPA's rationale for approving or denying an aquifer exemption request. The contractor shall review in depth the entire aquifer exemption package and draft the record of decision letter based on this review. The contractor shall use the template previously agreed upon for drafting the statement of basis letter and may need to revise figures in the aquifer exemption package provided by DOGGR.

For planning purposes, the contractor shall expect to draft up to six (6) record of decision letters during this period of performance and each record of decision shall be in the range of ten (10) to fifteen (15) pages. The first draft of the record of decision letter shall be due to the EPA WACOR within fifteen (15) business days of receipt of technical direction from the EPA WACOR. EPA will review the draft record of decision letter and submit comments to the contractor. Within ten (10) business days of receipt of EPA's comments, the contractor shall deliver a second draft of the record of decision letter to the EPA WACOR.

### **Subtask 3.3: Develop GIS maps**

Under this Task, the contractor shall develop GIS maps that plot the location of proposed aquifer exemptions or aquifer exemption applications received by EPA: the lateral and vertical extents of the aquifers proposed for exemption, if known; the location of Class II injection wells that may be shut-in or voluntarily relinquishing their permits; or the location of specific Class II wells by DOGGR Category or by DOGGR District, or other maps as required.

For planning purposes, the contractor shall develop up to two (2) GIS maps per aquifer exemption application that may be received throughout the period of performance, for a total of up to twelve (12) maps. The EPA WACOR will provide the contractor either a website where data can be downloaded or the actual data to be used in developing these maps. The contractor shall deliver a draft GIS map electronically to the EPA WACOR within ten (10) business days of receiving technical direction from the EPA WACOR and the data to be used in developing the map. EPA will review and submit comments on the maps to the contractor. Within five (5) business days of receipt of EPA's comments, the contractor shall deliver a final GIS map electronically to the EPA WACOR.

Development of GIS maps should leverage desktop software consistent with the Agency Enterprise License Agreement (ELA) agreement with ESRI. The contractor shall produce all maps consistent with EPA standards for GIS desktop software, the current Agency standard for desktop GIS tools is ESRI ArcGIS Desktop 10.4 or higher. In the event that map outputs require online publication, no customized software shall be developed to support this requirement. Online publication of maps should leverage EPA's Geoplatform technical architecture to the fullest extent possible. The contractor shall follow Geoplatform metadata policies and adhere to any publication procedures. The OW Geospatial Administrator and Communications Director must approve all new maps hosted on the Geoplatform prior to production release.

#### **Subtask 3.4: Provide Support for Technical Meetings and Communications Support**

Under this Task, the contractor shall provide technical support by attending up to four (4) technical meetings in Sacramento and/or Bakersfield, California. These meetings will involve technical discussions on proposed aquifer exemptions as well as status updates and usually last two (2) to three (3) hours. These meetings typically include staff and managers from EPA Region 9, DOGGR, State Water Board, and Regional Water Board. For planning purposes, the contractor shall expect to send one staff that is already located in California to Sacramento and/or Bakersfield for up to four (4) one-day or two-day meetings (includes duration of the meeting plus travel time). Dates and times of these meetings will be determined. The EPA WACOR will provide technical direction at a date to be determined for this Task.

For communication support, the contractor shall provide support in drafting up to two (2) technical presentations (slides, in PowerPoint, and talking points) on the California Class II program and aquifer exemptions. One presentation would be internal to EPA managers and staff and the second presentation would be for the public (e.g., GWPC). For planning purposes, these presentations would be thirty (30) minutes to one (1) hour each. Upon receipt of technical direction from the EPA WACOR, the contractor shall provide a draft presentation (slides and talking points) within fifteen (15) business days. EPA will review the presentation and submit comments to the contractor. Upon receipt of EPA's comments, the contractor shall provide a final draft of the presentation to the EPA WACOR within five (5) business days.

Under this Task, the contractor shall also support EPA in developing briefing papers or quick turnaround summary and/or status update papers. For planning purposes, the contractor shall receive technical direction to prepare up to three (3) briefing or quick turnaround papers. These papers should not exceed five (5) pages. Upon receipt of technical direction from the EPA

WACOR, the contractor shall deliver the briefing or quick turnaround paper within five (5) business days.

#### IV. SCHEDULE OF DELIVERABLES:

TASK No.	DELIVERABLE	DATE DUE TO EPA
Task 0: Work Plan and Budget		
	Work plan, budget, and QA supplemental	According to Contract
	Telephone calls between WACOR and Project Officer.	Monthly
	Kick-off Meeting by phone	Within 5 calendar days of work assignment approval
	Progress and financial reports	Monthly
Task 1:	Perform Comparison of states' §1422 UIC Programs (Including Class VI)	
	1.1 Electronic copy of states' regulations and statutes	TBD (within 10 calendar days of receiving Technical Direction)
	1.2 §1422 Crosswalk	TBD (within 60 calendar days of receiving Technical Direction)
	Crosswalk	
	1.3 Summary of Findings	TBD (within 60 calendar days of receiving Technical Direction)
	Summary	
Task 2:	Perform Comparison of states' §1425 UIC Programs	
	2.1 Electronic copy of states' regulations and statutes	TBD (within 10 calendar days of receiving Technical Direction)
	2.2 §1425 Crosswalk	TBD (within 60 calendar days of receiving Technical Direction)
	Crosswalk	
	2.3 Summary of Findings	TBD (within 60 calendar days of receiving Technical Direction)
	Summary	
Task 3:	Provide Non-Substantial UIC Program Revision Support for Aquifer Exemption Requests from the State of California	
	3.1 Aquifer Exemption Completeness Check and Review and Evaluation of Aquifer Exemption Requests and Supporting Documents	TBD (within ten business days of receiving Technical Direction)
	3.2 Provide Technical Support in Developing Record of Decision Letters for Approving or Denying Aquifer	

	Exemption Requests	
	First Draft	TBD (within fifteen business days of receiving Technical Direction)
	Second Draft	TBD (within five business days of receiving Technical Direction)
	3.3 Develop GIS Maps	
	First Draft	TBD (within ten business days of receiving Technical Direction)
	Final Draft	TBD (within five days of receiving Technical Direction)
	3.4 Provide Support for Technical Meetings and Communications Support	
	Technical Meetings	TBD
	Technical PowerPoint presentations First Draft	TBD (within fifteen business days of receiving Technical Direction)
	Final Draft	TBD (within five business days of receiving Technical Direction)
	Briefing Papers or Summary Reports	TBD (within five business days of receiving Technical Direction)

## V. MISCELLANEOUS

### Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0
Preferred Mapping software format	ESRI ArcGIS Desktop 10.4 or higher

## VI. TRAVEL

The contractor shall anticipate four trips in support of this WA (i.e., Task 3) over the duration of the performance period. The travel is anticipated to be to technical meetings with the State of California Department of Oil, Gas, and Geothermal Resources (DOGGR) in Sacramento,



California. Travel will be directly related to the scope of this Work Assignment and support advancement of the work under Task 3 as well as the EPA's Mission to ensure protection of Underground Sources of Drinking Water, human health and the environment.

For estimation purposes, the Contractor shall anticipate four individual trips (one contractor employee) to Sacramento, California. It is anticipated that the duration of each trip will be between one and one and a half days in length.

#### **VII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS**

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

#### **VIII. CONTRACTOR IDENTIFICATION**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

#### **IX. PRINTING**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

#### **X. TECHNICAL DIRECTION**

The Contract level COR or an authorized individual is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

#### **XI. QUALITY ASSURANCE SURVEILLANCE PLAN**

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards. Additional project specific quality assurance surveillance plan requirements are identified below.

<b><u>Performance Requirements</u></b>	<b><u>Performance Standards</u></b>	<b><u>Surveillance Methods</u></b>
Performance Standards are applicable to all PWS requirements and will be utilized to determine eligibility for Award Term Options.		



<p><b><u>Programmatic Requirement:</u></b> The contractor shall develop products that are based on best available information and resources.</p>	<p><b><u>Programmatic Standard:</u></b> Outputs are based on best available information and resources: Documentation of sources used, not used, and limitations of available data.</p>	<p>EPA will review all products for conformance with the requirements of the SDWA Amendments, Clean Water Act and other related mandates, including Small Business Regulatory Enforcement Fairness Act 1996 (SBREFA) and Unfunded Mandates Reform Act of 1995 (UMRA).</p>
<p><b><u>Cost Control Requirement</u></b> The Contractor shall perform all work in an efficient and cost effective manner, applying cost control measures where practical.</p>	<p><b><u>Cost Control Standard:</u></b> Implementation of cost control system to monitor and track project status, that indicate level of budget utilized and forecast remaining budget needs to complete project. The contractor shall notify project COR immediately in cases where issues impact project cost are identified.</p>	<p>The EPA Project Officer will routinely discuss the work progress and contract level and work assignment expenditures with the Project Manager. The WACOR will maintain regular contact with the Contractor's designated work assignment /project manager to discuss work assignment progress and expenditures and will review and verify expenditures and technical progress before invoice payments are authorized.</p>
<p><b><u>Schedule Requirement</u></b> The Contractor shall provide services and submit deliverables in accordance with approved work assignment milestone and deliverable schedules.</p>	<p><b><u>Schedule Standard:</u></b> Services and deliverables shall be in accordance with schedules stated in each task order. Unless amended or modified by an approved EPA action, a deliverable that is received 7-days past the due date, will be considered unsatisfactory performance.</p>	<p>EPA will closely monitor task milestone and deliverable schedules and review the Contract Monthly Progress Reports and any special reporting requirements to compare actual delivery dates to those approved in the work assignment.</p>
<p><b><u>Document Development Requirement:</u></b> The Contractor shall provide documents that are technically and factually accurate, and suited to the intended audience.</p>	<p><b><u>Document Development Standard:</u></b> Information to be disseminated by EPA will meet the requirements of OMB's "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity for Information Disseminated by Federal Agencies (67 FR 8451)</p>	<p>The WACOR will review drafts to assess technical accuracy and editorial quality. The WACOR will identify all inaccuracies and needed edits and corrections to the Contractor in the initial review of draft documents</p>

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 3-62				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000001				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2019 Base                      Option Period Number       3			Title of Work Assignment/SF Site Name UIC Primacy & Program Revisio				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 4.3					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   07/01/2018   To   06/30/2019				
Comments: The purpose of this Amendment 1 to Cadmus (EP-C-15-022) WA 3-62 is to 1) remove Lisa McWhirter as the EPA WACOR and add Kyle Carey as the new EPA WACOR, 2) increase the level of effort (LOE) to Tasks 1 and 4, and (3) add a new Task 3 to make UIC primacy documents 508 compliant.										
<input type="checkbox"/> Superfund						Accounting and Appropriations Data				<input checked="" type="checkbox"/> Non-Superfund
Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
SFO <input type="checkbox"/> (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE:		2,500				
09/01/2015 To 06/30/2019										
This Action:						0				
Total:						2,500				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee		LOE:				
Cumulative Approved:				Cost/Fee		LOE:				
Work Assignment Manager Name   Lisa McWhirter  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-564-2317 FAX Number:				
Project Officer Name   Nancy Parrotta  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:				
Other Agency Official Name   Lisa Mitchell-Flinn  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2852 FAX Number:				
Contracting Official Name   Angela Lower  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2036 FAX Number:				

**PERFORMANCE WORK STATEMENT**  
**Cadmus Contract # EP-C-15-022**  
**Work Assignment# 3-62**  
**Amendment 1**  
**Issuance to June 30, 2019**

**I. ADMINISTRATIVE**

**A. Title: UIC Primacy and Program Revision Support**

**B. Work Assignment COR (WACOR):**

Kyle Carey  
Office of Ground Water and Drinking  
Water (OGWDW)  
1200 Pennsylvania Avenue, NW (MC:  
4606M)  
Washington, DC 20460  
202-564-2322  
202-564-3754 (fax)

**Alternate Work Assignment COR  
(WACOR):**

Jill Dean  
Office of Ground Water and Drinking Water  
(OGWDW)  
1200 Pennsylvania Avenue, NW (MC:  
4606M)  
Washington, DC 20460  
202-564-8241  
202-564-3754 (fax)

**C. Quality Assurance**

Task 3 for subtasks 3-1, 3-2, 3-3 and 3-4 in this work assignment require the use of primary and /or secondary data. Consistent with the Agency's quality assurance (QA) requirements, the contractor must supplement the Contract Level Quality Assurance Project Plan (QAPP), which has been provided by the contractor, to assure the quality of the data used under task(s) 3 for subtasks 3-1, 3-2, 3-3 and 3-4 of this work assignment. Work on this/these task(s) cannot proceed until the contractor receives notification of the SQAPP approval from the PO via e-mail. The project specific quality assurance requirements must be addressed in the work plan and monthly progress reports as specified under Task 0, below.

**D. Background**

Part 147 of the Code of Federal Regulations sets forth the applicable Underground Injection Control (UIC) programs for each state, territory, and tribe identified pursuant to the Safe Drinking Water Act (SDWA) as needing a UIC program. These UIC programs are described in Part 147 as either a state-administered program approved by the EPA or a federally-administered program promulgated by the EPA. States can apply for primary enforcement authority for their UIC program(s) under §1422 or §1425 of the SDWA. Approval of a state program is based upon a determination by the Administrator that the programs meet the requirements of §1422 and/or § 1425 of SDWA and the applicable UIC provisions of Parts 124, 144, and 146 of the Code of Federal Regulations (CFR).

While 40 CFR Part 147 identifies the UIC programs and the supporting information, 40 CFR Part 145 lays out the requirements for UIC state program submissions and what the approval, revision and program withdrawal processes are for these programs. Therefore, in order to properly implement and enforce the UIC program, EPA codifies the approvals of state primacy programs and their respective revisions in Part 147. This ensures that the UIC requirements for well classes I, II, III, IV, V, and VI for each state and tribe are federally enforceable.

As of September 7, 2011, states, tribes and territories may also apply for Class VI Primacy. Consistent with the President's CCS Task Force, approving Class VI primacy applications will be a priority. As states' Class VI primacy applications are approved by the EPA Administrator, the states' Class VI UIC programs will be codified in 40 CFR Part 147.

In addition to UIC primacy and revision applications, states will be requesting EPA approval for aquifer exemptions, which are non-substantial program revisions. These program revisions are approved by letter instead of being approved by rule and codified in Part 147. The State of California is reviewing its Class II program and will be submitting aquifer exemption requests to EPA for review and approval.

This work assignment supports the steps necessary for the contractor to provide support in evaluating a state's (states') Class VI primacy application(s) and/or a state's (states') UIC program revision(s) to be codified in Part 147 as well as non-substantial program revisions that will be approved by letter. These steps include: providing support in evaluating Class VI primacy application(s) and/or UIC §1422 and/or §1425 program revision(s) and aquifer exemption requests from the State of California.

**II. OBJECTIVE:** The purpose of this Amendment 1 to WA 3-62, for Cadmus Contract # EP-C-15-022 is to 1) remove Lisa McWhirter as the EPA WACOR and add Kyle Carey as the new EPA WACOR; 2) increase the level of effort (LOE) to Tasks 1 and 4; and (3) add a new Task 3 to make UIC primacy documents 508 compliant.

**LOE: Total 5150 hours (2500 base; 2650 Amendment 1)**

### **III. TASK DETAIL**

The contractor shall perform the following tasks:

#### **Task 0: Work Plan and Monthly Progress Reports**

The contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. In addition, the workplan shall include the requirement that all electronic and information technology (EIT) and all EIT deliverables be Section 508 compliant in accordance with the policies referenced at <http://www.epa.gov/accessibility/>. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the contractor shall include information on plans to manage work and contract costs.

In addition, the contractor shall prepare a Supplemental Project Specific Quality Assurance Project Plan (SQAPP) appending the Contract Level Quality Assurance Project Plan (QAPP), noted above, and ensure the quality of secondary data used to complete these tasks. The work plan shall explain when the SQAPP will be submitted based on the specific data requirements of the WA. This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs' broken out by the tasks in this WA.

**Deliverables:** Work plan, Supplemental Project Specific Quality Assurance Project Plan, monthly progress and financial reports.

**Task 1: Perform comparison of State UIC §1422 Program Regulations (Including Class VI) (PWS Section 4.3)**

Increasing the level of effort from four (4) states to five (5) states.

**Subtask 1.1: Research Federal and State SDWA § 1422 UIC Program Regulations (Including Class VI) for up to five (5) states**

Under this work assignment, the EPA WACOR will identify up to five (5) state UIC §1422 programs that the contractor shall analyze. Some of these five (5) states may be for Classes I-V and/or Class VI or Class VI only. The contractor shall provide technical support to EPA Headquarters for the following: (1) review the state UIC §1422 program regulation text in 40 CFR Part 147 for those state(s) identified by the EPA WACOR and note the state statutory and regulatory citations codified in Part 147 for each state identified by the EPA WACOR, (2) initiate a web search to locate the state statutes and regulations for each state identified by the EPA WACOR, (3) gather these statutes and regulations electronically for each state identified by the EPA WACOR and deliver to the EPA WACOR. The WACOR will identify up to five (5) state UIC §1422 programs to be analyzed through technical direction. After receiving technical direction from the EPA WACOR, the contractor shall deliver electronically a copy of the state(s) UIC statutes and regulations to the EPA WACOR within ten (10) calendar days. The EPA WACOR will review and confirm the use of the state's UIC statutes and regulations for the crosswalk analysis in subtask 1.2 below.

**Subtask 1.2: Develop and Perform Comparison of State UIC §1422 Crosswalks (Including Class VI)**

Under this work assignment, the contractor shall use the §1422 crosswalk and/or the Class VI crosswalk to perform a detailed comparison of the state's UIC statutes and regulations. These crosswalk templates will be provided to the contractor. The contractor shall note any changes, if any, and/or any differences in the state's statutes and regulations from the federal regulations and include these notes in the crosswalk. For planning purposes, the contractor shall perform a detailed comparison of up to five (5) state UIC §1422 programs that will be identified by the EPA WACOR through technical direction. After receiving technical direction, the contractor shall deliver a crosswalk for each of the states identified to the EPA WACOR for review and comment. For planning purposes, the EPA WACOR plans to issue technical direction for each state (up to five (5)) and will stagger these technical directions throughout the performance period (e.g., one technical direction every month or two (2) months). Once the contractor receives technical direction from the EPA WACOR, the contractor shall have sixty (60) calendar days to deliver the draft crosswalk to the EPA WACOR.

**Subtask 1.3: Summarize Findings in Subtask 1.2**

Under this work assignment, the contractor shall summarize the major changes in states' regulations and statutes as well as any major differences between the states' regulations and the federal regulations in 40 CFR 124, 144, 146, and, if applicable, 148. The draft summary document shall not exceed five (5) pages and be delivered to the EPA WACOR along with the draft crosswalk. For planning purposes, the contractor shall deliver up to five (5) draft summary documents along with the draft crosswalks to be delivered under subtask 1.2 above.

**Task 2: Perform comparison of State UIC §1425 Program Regulations**

No change.

**Task 3: Provide Technical Support for 508 compliance formatting of UIC Primacy Documents**  
New Task.

Under this Task, the contractor shall conduct 508 compliance formatting on UIC primacy documents to be identified by the EPA WACOR. For planning purposes, the EPA WACOR will provide up to seven (7) documents that will need 508 compliance formatting. These seven (7) documents will include: 1) the 1422 crosswalk used in Task 1 above (approximately 350 pages); 2) the 1425 crosswalk to be provided to the contractor (approximately 25 pages); 3) a sample Governor's Letter (approximately 1 page); 4) a sample Attorney General's Statement (approximately 3 to 5 pages); 5) a sample program description (approximately 50 to 100 pages); 6) a sample Memorandum of Agreement (approximately 10 to 15 pages); and 7) a sample Memorandum of Understanding (approximately 5 to 10 pages). For estimation purposes, it is assumed that these seven (7) documents will not exceed a total of 520 pages in length.

The 508 compliance formatting for each document described above shall be due to the EPA WACOR within ten (10) business days of receipt of technical direction from the EPA WACOR. The EPA WACOR will stagger these technical directions throughout the performance period (e.g., one technical direction per two weeks).

#### **Task 4: Provide Non-substantial UIC Program Revision Support for Aquifer Exemption Requests from the State of California**

Increasing the level of effort from six (6) aquifer exemption packages to fourteen (14) aquifer exemption packages. Renumbering this Task from 3 to 4.

The State of California has SDWA §1425 primacy (or primary enforcement authority) for Class II UIC wells and has issued UIC permits for these wells. As part of the permitting process, the State of California is required to determine whether the owner/operator seeking a Class II permit will be injecting into an underground source of drinking water (USDW) as defined by the Safe Drinking Water Act. If the injection will be or currently is in a USDW, the State of California must submit an aquifer exemption package to EPA Region 9 in order to permit these Class II injection activities. Some aquifers were exempted at the time California received primacy. However, over the years many of these Class II operations have expanded and/or moved into different formations, and injection is occurring outside the boundary of the original exempted aquifers. As a result, the State of California is requesting the owners/operators of these Class II wells to submit an aquifer exemption package to continue operating in these formations. After California reviews the aquifer exemption packages and determines that the injection activities meet the aquifer exemption criteria, California will forward these aquifer exemption packages to EPA Region 9.

For planning purposes, EPA Region 9 expects to receive up to fourteen (14) aquifer exemption packages from the State of California throughout the period of performance. Under this work assignment, the EPA WACOR will send the contractor nonsubstantial UIC program revisions for aquifer exemption packages from the State of California. The EPA WACOR expects to send these requests to the contractor electronically.

##### **Subtask 4.1: Aquifer Exemption Completeness Check and Review and Evaluation of Aquifer Exemption Requests and Supporting Documents**

Increasing the level of effort from six (6) aquifer exemption packages to fourteen (14) aquifer exemption packages.

Under this Task, the contractor shall use a modified aquifer exemption checklist that was developed for reviewing proposed aquifer exemption packages submitted to EPA Region 9 by the

State of California. This checklist is based on the original checklist found in the EPA Water Division Directors Memo, "Enhancing Coordination and Communication with States on Review and Approval of Aquifer Exemption Requests under SDWA," dated July 24, 2014.

For each aquifer exemption package the EPA WACOR receives from the State of California and forwards to the contractor, the contractor shall use the modified checklist described above and compare the aquifer exemption package to that checklist and determine whether the State of California has submitted a complete aquifer exemption package. In addition, the contractor shall determine whether the information provided by the State of California is adequate to substantiate the aquifer exemption packages. To make this determination, the Contractor shall review and evaluate the data, modeling results, and analyses submitted by the State of California to support its recommendation(s) to EPA to approve the aquifer exemption packages. In the summary memo, the contractor shall also make recommendations for EPA to request from the State of California additional data that may be missing and/or insufficient to support the conclusions in the aquifer exemption package(s).

EPA Region 9 expects to receive up to fourteen (14) aquifer exemption packages from the State of California. The EPA WACOR will forward these aquifer exemption packages electronically to the contractor. For planning purposes, the contractor shall summarize the completeness check and provide a detailed review of the aquifer exemption packages and develop a report or memo not to exceed ten (10) pages per aquifer exemption package and deliver the report to the EPA WACOR within ten (10) business days of receipt of the aquifer exemption package. The contractor shall expect to deliver up to fourteen (14) ten-page summary reports.

#### **Subtask 4.2: Provide Technical Support in Developing Record of Decision Letters for Approving or Denying Aquifer Exemption Requests**

Increasing the level of effort from six (6) aquifer exemption packages to fourteen (14) aquifer exemption packages.

Under this Task, the EPA WACOR will request contractor support in drafting the record of decision letter that will provide EPA's rationale for approving or denying an aquifer exemption request. The contractor shall review in depth the entire aquifer exemption package and draft the record of decision letter based on this review. The contractor shall use the template previously agreed upon for drafting the statement of basis letter and may need to revise figures in the aquifer exemption package provided by DOGGR.

For planning purposes, the contractor shall expect to draft up to fourteen (14) record of decision letters during this period of performance and each record of decision shall be in the range of ten (10) to fifteen (15) pages. The first draft of the record of decision letter shall be due to the EPA WACOR within fifteen (15) business days of receipt of technical direction from the EPA WACOR. EPA will review the draft record of decision letter and submit comments to the contractor. Within ten (10) business days of receipt of EPA's comments, the contractor shall deliver a second draft of the record of decision letter to the EPA WACOR.

#### **Subtask 4.3: Develop GIS maps**

No change.

#### **Subtask 4.4: Provide Support for Technical Meetings and Communications Support**

No change.

#### IV. SCHEDULE OF DELIVERABLES:

TASK No.	DELIVERABLE	DATE DUE TO EPA
Task 0: Work Plan and Budget		
	Work plan, budget, and QA supplemental	According to Contract
	Telephone calls between WACOR and Project Officer.	Monthly
	Kick-off Meeting by phone	Within 5 calendar days of work assignment approval
	Progress and financial reports	Monthly
Task 1:	Perform Comparison of states' §1422 UIC Programs (Including Class VI)	
	1.1 Electronic copy of states' regulations and statutes	TBD (within 10 calendar days of receiving Technical Direction)
	1.2 §1422 Crosswalk Crosswalk	TBD (within 60 calendar days of receiving Technical Direction)
	1.3 Summary of Findings Summary	TBD (within 60 calendar days of receiving Technical Direction)
Task 2:	Perform Comparison of states' §1425 UIC Programs	
	2.1 Electronic copy of states' regulations and statutes	TBD (within 10 calendar days of receiving Technical Direction)
	2.2 §1425 Crosswalk Crosswalk	TBD (within 60 calendar days of receiving Technical Direction)
	2.3 Summary of Findings Summary	TBD (within 60 calendar days of receiving Technical Direction)
Task 3:	<b>Provide Technical Support for 508 compliance formatting of UIC Primacy Documents</b>	
	Seven documents needing 508 compliance formatting	TBD (within 10 business days of receiving Technical Direction)
Task 4:	Provide Non-Substantial UIC Program Revision Support for Aquifer Exemption Requests from the State of California	
	4.1 Aquifer Exemption Completeness Check and Review and Evaluation of Aquifer Exemption Requests and Supporting Documents	TBD (within ten business days of receiving Technical Direction)
	4.2 Provide Technical Support in Developing Record of	



	Decision Letters for Approving or Denying Aquifer Exemption Requests	
	First Draft	TBD (within fifteen business days of receiving Technical Direction)
	Second Draft	TBD (within five business days of receiving Technical Direction)
	4.3 Develop GIS Maps	
	First Draft	TBD (within ten business days of receiving Technical Direction)
	Final Draft	TBD (within five days of receiving Technical Direction)
	4.4 Provide Support for Technical Meetings and Communications Support	
	Technical Meetings	TBD
	Technical PowerPoint presentations First Draft	TBD (within fifteen business days of receiving Technical Direction)
	Final Draft	TBD (within five business days of receiving Technical Direction)
	Briefing Papers or Summary Reports	TBD (within five business days of receiving Technical Direction)

## V. MISCELLANEOUS

### Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0
Preferred Mapping software format	ESRI ArcGIS Desktop 10.4 or higher

## VI. TRAVEL

The contractor shall anticipate four trips in support of this WA (i.e., Task 3) over the duration of the performance period. The travel is anticipated to be to technical meetings with the State of

California Department of Oil, Gas, and Geothermal Resources (DOGGR) in Sacramento, California. Travel will be directly related to the scope of this Work Assignment and support advancement of the work under Task 3 as well as the EPA's Mission to ensure protection of Underground Sources of Drinking Water, human health and the environment.

For estimation purposes, the Contractor shall anticipate four individual trips (one contractor employee) to Sacramento, California. It is anticipated that the duration of each trip will be between one and one and a half days in length.

## **VII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS**

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

## **VIII. CONTRACTOR IDENTIFICATION**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

## **IX. PRINTING**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

## **X. TECHNICAL DIRECTION**

The Contract level COR or an authorized individual is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

## **XI. QUALITY ASSURANCE SURVEILLANCE PLAN**

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards. Additional project specific quality assurance surveillance plan requirements are identified below.

<b><u>Performance Requirements</u></b>	<b><u>Performance Standards</u></b>	<b><u>Surveillance Methods</u></b>
Performance Standards are applicable to all PWS requirements and will be utilized to determine eligibility for Award Term Options.		

<p><b><u>Programmatic Requirement:</u></b> The contractor shall develop products that are based on best available information and resources.</p>	<p><b><u>Programmatic Standard:</u></b> Outputs are based on best available information and resources; Documentation of sources used, not used, and limitations of available data.</p>	<p>EPA will review all products for conformance with the requirements of the SDWA Amendments, Clean Water Act and other related mandates, including Small Business Regulatory Enforcement Fairness Act 1996 (SBREFA) and Unfunded Mandates Reform Act of 1995 (UMRA).</p>
<p><b><u>Cost Control Requirement</u></b> The Contractor shall perform all work in an efficient and cost effective manner, applying cost control measures where practical.</p>	<p><b><u>Cost Control Standard:</u></b> Implementation of cost control system to monitor and track project status, that indicate level of budget utilized and forecast remaining budget needs to complete project. The contractor shall notify project COR immediately in cases where issues impact project cost are identified.</p>	<p>The EPA Project Officer will routinely discuss the work progress and contract level and work assignment expenditures with the Project Manager. The WACOR will maintain regular contact with the Contractor's designated work assignment /project manager to discuss work assignment progress and expenditures and will review and verify expenditures and technical progress before invoice payments are authorized.</p>
<p><b><u>Schedule Requirement</u></b> The Contractor shall provide services and submit deliverables in accordance with approved work assignment milestone and deliverable schedules.</p>	<p><b><u>Schedule Standard:</u></b> Services and deliverables shall be in accordance with schedules stated in each task order. Unless amended or modified by an approved EPA action, a deliverable that is received 7-days past the due date, will be considered unsatisfactory performance.</p>	<p>EPA will closely monitor task milestone and deliverable schedules and review the Contract Monthly Progress Reports and any special reporting requirements to compare actual delivery dates to those approved in the work assignment.</p>
<p><b><u>Document Development Requirement:</u></b> The Contractor shall provide documents that are technically and factually accurate, and suited to the intended audience.</p>	<p><b><u>Document Development Standard:</u></b> Information to be disseminated by EPA will meet the requirements of OMB's "Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity for Information Disseminated by Federal Agencies (67 FR 8451)</p>	<p>The WACOR will review drafts to assess technical accuracy and editorial quality. The WACOR will identify all inaccuracies and needed edits and corrections to the Contractor in the initial review of draft documents</p>

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 3-62				
						<input type="checkbox"/> Other <input checked="" type="checkbox"/> Amendment Number: 000002				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2019 Base                      Option Period Number       3			Title of Work Assignment/SF Site Name UIC Primacy & Program Revision				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 4.3					
Purpose: <input type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input checked="" type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From   07/01/2018   To   06/30/2019				
Comments: The purpose of this amendment 2 to Cadmus (EP-C-15-022) WA 3-62 is to(1) submit a new Quality Assurance form to correctly reflect applicability of the SQAPP developed under 2-62 to 3-62; and (2) re-number the tasks to be consistent with the original Quality Assurance Review form, which were incorrectly altered										
<input type="checkbox"/> Superfund    Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE: 2,500						
09/01/2015 To 06/30/2019										
This Action:				0						
Total:				2,500						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee			LOE:			
Cumulative Approved:				Cost/Fee			LOE:			
Work Assignment Manager Name   Kyle Carey							Branch/Mail Code:			
_____ (Signature)    (Date)							Phone Number: 202-564-2322			
							FAX Number:			
Project Officer Name   Nancy Parrotta							Branch/Mail Code:			
_____ (Signature)    (Date)							Phone Number: 202-564-5260			
							FAX Number:			
Other Agency Official Name							Branch/Mail Code:			
_____ (Signature)    (Date)							Phone Number:			
							FAX Number:			
Contracting Official Name   Angela Lower							Branch/Mail Code:			
_____ (Signature)    (Date)							Phone Number: 513-487-2036			
							FAX Number:			

**PERFORMANCE WORK STATEMENT**  
**Cadmus Contract # EP-C-15-022**  
**Work Assignment# 3-62**  
**Amendment 2**  
**July 1, 2018 to June 30, 2019**

**I. ADMINISTRATIVE**

**A. Title: UIC Primacy and Program Revision Support**

**B. Work Assignment COR (WACOR):**

Kyle Carey  
Office of Ground Water and Drinking  
Water (OGWDW)  
1200 Pennsylvania Avenue, NW (MC:  
4606M)  
Washington, DC 20460  
202-564-2322  
202-564-3754 (fax)

**Alternate Work Assignment COR  
(WACOR):**

Jill Dean  
Office of Ground Water and Drinking Water  
(OGWDW)  
1200 Pennsylvania Avenue, NW (MC:  
4606M)  
Washington, DC 20460  
202-564-8241  
202-564-3754 (fax)

**C. Quality Assurance**

Task 3 for subtasks 3-1, 3-2, and 3-3 in this work assignment require the use of primary and /or secondary data. Consistent with the Agency's quality assurance (QA) requirements, the contractor must supplement the Contract Level Quality Assurance Project Plan (QAPP), which has been provided by the contractor, to assure the quality of the data used under task(s) 3 for subtasks 3-1, 3-2, and 3-3 of this work assignment. Work on this/these task(s) cannot proceed until the contractor receives notification of the SQAPP approval from the PO via e-mail. The project specific quality assurance requirements must be addressed in the work plan and monthly progress reports as specified under Task 0, below.

**D. Background**

No change.

**II. OBJECTIVE:** The purpose of this Amendment 2 to WA 3-62, for Cadmus Contract # EP-C-15-022 is to (1) submit a new Quality Assurance form to correctly reflect applicability of the SQAPP developed under 2-62 to 3-62; and (2) re-number the tasks to be consistent with the original Quality Assurance Review form, which were incorrectly altered under Amendment 1.

**III. TASK DETAIL**

The contractor shall perform the following tasks:

**Task 0: Work Plan and Monthly Progress Reports**

No change.

**Task 1: Perform comparison of State UIC §1422 Program Regulations (Including Class VI) (PWS Section 4.3)**

No change.

**Task 2: Perform comparison of State UIC §1425 Program Regulations**

No change.

**Task 3: Provide Non-substantial UIC Program Revision Support for Aquifer Exemption Requests from the State of California**

Moved back from Task 4 to Task 3.

**Subtask 3.1: Aquifer Exemption Completeness Check and Review and Evaluation of Aquifer Exemption Requests and Supporting Documents**

No change, was Subtask 4.1.

**Subtask 3.2: Provide Technical Support in Developing Record of Decision Letters for Approving or Denying Aquifer Exemption Requests**

No change, was Subtask 4.2.

**Subtask 3.3: Develop GIS maps**

No change, was Subtask 4.3.

**Subtask 3.4: Provide Support for Technical Meetings and Communications Support**

No change, was Subtask 4.4.

**Task 4: Provide Technical Support for 508 compliance formatting of UIC Primacy Documents**

No change, was Task 3.

**IV. SCHEDULE OF DELIVERABLES:**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
<b>Task 0: Work Plan and Budget</b>		
	Work plan, budget, and QA supplemental	According to Contract
	Telephone calls between WACOR and Project Officer.	Monthly
	Kick-off Meeting by phone	Within 5 calendar days of work assignment approval
	Progress and financial reports	Monthly
<b>Task 1:</b>	<b>Perform Comparison of states' §1422 UIC Programs (Including Class VI)</b>	
	1.1 Electronic copy of states' regulations and statutes	TBD (within 10 calendar days of receiving Technical Direction)
	1.2 §1422 Crosswalk	

	Crosswalk	TBD (within 60 calendar days of receiving Technical Direction)
	1.3 Summary of Findings Summary	TBD (within 60 calendar days of receiving Technical Direction)
Task 2:	Perform Comparison of states' §1425 UIC Programs	
	2.1 Electronic copy of states' regulations and statutes	TBD (within 10 calendar days of receiving Technical Direction)
	2.2 §1425 Crosswalk Crosswalk	TBD (within 60 calendar days of receiving Technical Direction)
	2.3 Summary of Findings Summary	TBD (within 60 calendar days of receiving Technical Direction)
Task 3:	<b>Provide Technical Support for 508 compliance formatting of UIC Primacy Documents</b>	
	Seven documents needing 508 compliance formatting	TBD (within 10 business days of receiving Technical Direction)
Task 3:	Provide Non-Substantial UIC Program Revision Support for Aquifer Exemption Requests from the State of California	
	3.1 Aquifer Exemption Completeness Check and Review and Evaluation of Aquifer Exemption Requests and Supporting Documents	TBD (within ten business days of receiving Technical Direction)
	3.2 Provide Technical Support in Developing Record of Decision Letters for Approving or Denying Aquifer Exemption Requests  First Draft	TBD (within fifteen business days of receiving Technical Direction)
	Second Draft	TBD (within five business days of receiving Technical Direction)
	3.3 Develop GIS Maps  First Draft	TBD (within ten business days of receiving Technical Direction)
	Final Draft	TBD (within five days of receiving Technical Direction)
	3.4 Provide Support for Technical Meetings and Communications Support	

	Technical Meetings	TBD
	Technical PowerPoint presentations First Draft	TBD (within fifteen business days of receiving Technical Direction)
	Final Draft	TBD (within five business days of receiving Technical Direction)
	Briefing Papers or Summary Reports	TBD (within five business days of receiving Technical Direction)
Task 4:	<b>Provide Technical Support for 508 compliance formatting of UIC Primacy Documents</b>	
	Seven documents needing 508 compliance formatting	TBD (within 10 business days of receiving Technical Direction)

## V. MISCELLANEOUS

### Software Application Files and Accessibility

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0
Preferred Mapping software format	ESRI ArcGIS Desktop 10.4 or higher

## VI. TRAVEL

The contractor shall anticipate four trips in support of this WA (i.e., Task 3) over the duration of the performance period. The travel is anticipated to be to technical meetings with the State of California Department of Oil, Gas, and Geothermal Resources (DOGGR) in Sacramento, California. Travel will be directly related to the scope of this Work Assignment and support advancement of the work under Task 3 as well as the EPA's Mission to ensure protection of Underground Sources of Drinking Water, human health and the environment.

For estimation purposes, the Contractor shall anticipate four individual trips (one contractor employee) to Sacramento, California. It is anticipated that the duration of each trip will be between one and one and a half days in length.

## VII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting



Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

#### **VIII. CONTRACTOR IDENTIFICATION**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

#### **IX. PRINTING**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

#### **X. TECHNICAL DIRECTION**

The Contract level COR or an authorized individual is permitted to provide technical direction. Technical direction must be within the statement of work of the contract and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

#### **XI. QUALITY ASSURANCE SURVEILLANCE PLAN**

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards.

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 3-63				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2019 Base                      Option Period Number       3			Title of Work Assignment/SF Site Name UIC Prog: Support for MIT Doc				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 5.1, 5.22, 2.3					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   08/15/2018   To   06/30/2019					
Comments: Immediate Start is Authorized.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE:						
09/01/2015   To   06/30/2019				0						
This Action:				554						
Total:				554						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee		LOE:				
Cumulative Approved:				Cost/Fee		LOE:				
Work Assignment Manager Name    Suzanne Kelly  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-564-3887 FAX Number:				
Project Officer Name    Nancy Parrotta  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:				
Other Agency Official Name    Lisa Mitchell-Flinn  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2852 FAX Number:				
Contracting Official Name    Angela Lower  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2036 FAX Number:				

**PERFORMANCE WORK STATEMENT**  
**EP-C-15-022**  
**Work Assignment 3-63**  
**Issuance to June 30, 2019**

**I. ADMINISTRATIVE:**

**A. Title:** UIC Program Support for Mechanical Integrity Testing Document Revisions

**B. Work Assignment Contracting  
Officer's Representative (WACOR):**

**Alternate Work Assignment Contracting  
Officer's Representative (WACOR):**

Suzanne Kelly  
Office of Ground Water and Drinking  
Water (OGWDW)  
1200 Pennsylvania Avenue, NW (MC:  
4606M)  
Washington, DC 20460  
202-564-3887  
kelly.suzanne@epa.gov

**C. Quality Assurance:**

The tasks in this work assignment do not require environmental measurements. Consistent with the Agency's quality assurance (QA) requirements, the contractor does not need to supplement the Contract Level Quality Assurance Project Plan (QAPP) or to prepare a Project-Specific Quality Assurance Project Plan (PQAPP).

**D. Background:**

The Environmental Protection Agency (EPA), as authorized by the Safe Drinking Water Act, establishes minimum federal requirements for Underground Injection Control (UIC) programs for the protection of underground sources of drinking water (USDWs). The UIC Program is responsible for permitting the construction, operation, monitoring, reporting and closure of the injection wells in a manner necessary to protect USDWs.

The Underground Injection Control (UIC) Program managers in EPA Headquarters and Regions identified that there is an urgent need to update the Mechanical Integrity Testing Document (MIT) which was last revised in 1982. MIT tests are used by the UIC Program to ensure that injection wells, and the mechanical components of the injection wells, are functioning properly in a manner that is protective of underground sources of drinking water (USDW). MIT tests are used to verify that leaks are not occurring in the internal parts (casing, packer and tubing) of an injection well. They are also used to verify that fluid is not moving externally, such as between or into USDWs through channels adjacent to the borehole. Endangerment of USDWs can occur when injection activities cause the movement of fluid into a USDW. EPA's UIC Program routinely uses MIT tests to verify that injection wells are

operating properly and that no unintended fluid movement is occurring. The tasks under this work assignment support the Agency's goal of protecting USDWs.

## **II. OBJECTIVE:**

The contractor shall provide support to EPA in reviewing and revising the Agency's 1982 Mechanical Integrity Testing document. The intended audience for this project is the UIC Program technical staff in EPA Regions and Headquarters.

This work will be completed commensurate with Sections 2.2, 2.2.7, and 2.3 of the Contract Level PWS.

LOE: 554 Hours

## **III. TASK DETAIL:**

The contractor shall perform the following tasks:

### **Task 0: Work Plan**

The contractor shall prepare a detailed work plan and budget for the accomplishment of the indicated tasks in accordance with the clause Work Assignments (EPAAR 1552.211-74). The work plan shall include a description of: (a) proposed staff; (b) the number of hours and labor classifications proposed for each task, broken down to task level, to include both prime contractor and subcontractor labor; and (c) a list of deliverables, with due dates and schedule for deliverables.

If subcontractor(s) is proposed and subcontractors are outside of the local metropolitan area, the contractor shall include information on plans to manage the work and contract costs. In addition, the work plan shall specify that a Supplemental Project Specific Quality Assurance Project Plan (SQAPP) appending the Contract QAPP or a PQAPP is not required.

At this time no events, meetings, or trainings are anticipated for this work assignment. However, the Contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, AV and rental of venue costs, etc. The EPA WACOR will then prepare approval internal paperwork for the event and will advise the Contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event. If the event is being sponsored by another EPA organization, the organization providing the planning is responsible for the approval.

### Deliverables:

- Work plan and monthly progress and financial reports.

### **Task 1: Review and Suggest Edits to the 1982 MIT Publication**

In collaboration with EPA, the contractor shall review the 1982 MIT document and identify revisions or edits needed to update the document. For estimation purposes, the Contractor shall anticipate the following types of edits:

- Provide background information on MIT testing including the different types of tests and tools available for use for Class I-VI well classes.
- Explain the two parts of a MIT test.
- Explain in which scenarios certain MIT tests should or should not be used.
- Confirm that the existing citations are relevant and if not, suggest edits to correct citation.
- Explain how to evaluate and interpret MIT test results/reports.
- Confirm that the cost information providing in the publication are still relevant and if not, suggest edits to correct the cost information.
- Determine which graphics and/or figures are illegible or difficult to understand and suggest revisions.
- Identify any other obsolete information or analyses referenced in the document.
- Identify any other current or relevant MIT information that should be included in the document.
- Suggest draft report templates for the appendix.

After receiving technical direction from the WACOR, the contractor shall initiate a 30-minute teleconference between the Contractor and the WACOR. During the teleconference EPA will walk through the bulleted list above and will answer any questions raised by the Contractor before the Contractor shall initiate review of the document. It is not anticipated that the outcome of the call will change the scope of the contractor's work rather it will serve to communicate specific details about the bulleted list above.

Deliverables:

- 1) Upon receipt of technical direction from WACOR, the Contractor shall schedule and hold a 30-minute teleconference with WACOR prior to initiating review of the MIT document.
- 2) Within 10 weeks of holding the teleconference call, the Contractor shall deliver a draft list of proposed edits and corresponding page number in WORD format to the EPA WACOR for review and comment.
- 3) Upon receipt of technical direction from WACOR, the Contractor shall schedule and hold an hour-long teleconference call with WACOR to discuss the draft list of proposed edits.
- 4) Upon receipt of technical direction from WACOR, The Contractor shall finalize the list of proposed edits within 10 business days of receipt of comments from the WACOR.

**Task 2: Develop a redline strike out of the 1982 MIT Publication**

Upon receipt of technical direction from the EPA WACOR, the contractor shall develop a redline strikeout of the 1982 MIT publication that addresses the final list of proposed edits developed for Task 1. The draft red line strike out of the 1982 MIT publication shall be delivered in an electronic WORD format to the EPA WACOR for review and comment no more than 10 weeks after receipt of technical direction from the EPA WACOR. For purposes of estimation, the red line strikeout document will be approximately 50 pages in length.

The contractor shall finalize the red line strike out within 2 weeks after receipt of comments from the EPA WACOR.

Deliverables:

- 1) Within 10 weeks of receiving technical direction, the contractor shall deliver a redline strikeout of the 1982 MIT publication in WORD format to the EPA WACOR for review and comment.
- 2) The contractor shall finalize the red line strike out within 10 business days upon receipt of comments from the EPA WACOR.

**Task 3: Comment support on redline strike out of the 1982 MIT Publication**

During the performance period of this work assignment, it is anticipated that EPA may receive comments from the Regions on the draft redline strikeout of the MIT document. Upon receipt of technical direction from the EPA WACOR, the contractor shall provide recommendations for resolving these comments (text revisions/edits) to the EPA WACOR for review and comment. For estimation purposes, the contractor shall anticipate EPA may receive up to 15 technical comments over the course of the performance period for this WA. The contractor shall deliver recommendations on how to address these comments within two weeks of receipt of technical direction from the EPA WACOR.

Deliverable:

- Within two weeks of receiving technical direction from the EPA WACOR, the Contractor shall propose revised edits to address the comments in WORD format to the EPA WACOR for review and comment.

**IV. SCHEDULE OF DELIVERABLES:**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
<b>Task 0: Work Plan and Monthly Progress Reports</b>		
	Work plan, budget	According to contract
	Monthly progress and financial reports	Monthly
<b>Task 1: Review the 1982 MIT Publication</b>		
	Teleconference Meeting (30 minutes)	Within 2 weeks of receiving technical direction from the EPA WACOR
	Suggest Revisions/Edits in Word format	Within 10 weeks of receiving technical direction from the EPA WACOR
	Teleconference Meeting (1 hour)	Within 2 weeks of receiving technical direction from the EPA WACOR
	Final list of Revisions	Within 10 business days after receipt of comments from the EPA WACOR

<b>Task 2: Develop Red-line strikeout of MIT Publication</b>		
	Draft red line strikeout of MIT document	Within 10 weeks of receiving technical direction from the EPA WACOR
	Final redline strikeout of MIT document	Within 2 weeks of receiving comments from the EPA WACOR
<b>Task 3: Comment Support for Red-line Strikeout of MIT publication</b>		
	Suggested revisions/edits to address comments	Within 2 weeks of receipt of technical direction from the EPA WACOR

## **V. MISCELLANEOUS**

### **Software Application Files and Accessibility**

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0

## **VI. TECHNICAL DIRECTION**

The CLCOR or WACOR is permitted to provide technical direction. Technical direction must be within the scope of the WA PWS and includes: (1) Direction to the contractor which assists the contractor in accomplishing the Statement of Work, (2) Comments on and approval of reports or other deliverables. Technical direction will be issued in writing or confirmed in writing within five (5) calendar days after verbal issuance. One copy of the technical direction memorandum will be forwarded to the Contracting Officer and the Contract Level Contracting Officer Representative.

## **VII. TRAVEL**

The contractor shall not anticipate any travel associated with this WA over the duration of the performance period.

## **VIII. MEETINGS, CONFERENCES, TRAINING EVENTS, AWARD CEREMONIES AND RECEPTIONS**

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting

Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

#### **IX. CONTRACTOR IDENTIFICATION**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

#### **X. PRINTING**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

#### **XI. QUALITY ASSURANCE AND SURVEILLANCE PLAN (QASP)**

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, timeliness/deliverables, and document development standards.



<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 3-70				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period 09/01/2015 To 06/30/2019 Base                      Option Period Number    3			Title of Work Assignment/SF Site Name Aquifer Exemption Data Initiat				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 2.2, 2.3, 4.3, 6.1, 6.2, 6.3, 7.4					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval						Period of Performance  From 07/01/2018 To 06/30/2019				
Comments: Immediate start is authorized for this work assignment but work shall not commence until 7/1/2018.										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> (Max 2)                      Note: To report additional accounting and appropriations date use EPA Form 1900-69A.										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:				LOE: 0				
09/01/2015 To 06/30/2019										
This Action:						598				
Total:						598				
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee			LOE:			
Cumulative Approved:				Cost/Fee			LOE:			
Work Assignment Manager Name    Jill Dean						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 202-564-8241				
						FAX Number:				
Project Officer Name    Nancy Parrotta						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 202-564-5260				
						FAX Number:				
Other Agency Official Name    Lisa Mitchell-Flinn						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 513-487-2852				
						FAX Number:				
Contracting Official Name    Angela Lower						Branch/Mail Code:				
_____ (Signature)                      (Date)						Phone Number: 513-487-2036				
						FAX Number:				

**PERFORMANCE WORK STATEMENT**  
**Cadmus EP-C-15-022**  
**Work Assignment No. 3-70**  
**July 1, 2018 – June 30, 2019**

**I. ADMINISTRATIVE:**

**A. Title: Aquifer Exemption Data Initiative**

**B. Work Assignment Contracting  
Officer's Representative (WACOR):**

Jill Dean  
US EPA Headquarters  
OGWDW (4606M)  
1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Office: 202-564-8241  
Fax: 202-564-3756  
E-mail: dean.jill@epa.gov

**Alternate WACOR:**

Lisa McWhirter  
US EPA Headquarters  
OGWDW (4606M)  
1200 Pennsylvania Avenue NW  
Washington, DC 20460  
Office: 202-564-2317  
Fax: 202-564-3756  
E-mail: mcwhirter.lisa@epa.gov

**C. Quality Assurance:**

Tasks 2 and 3 in this Work Assignment (WA) require the use of primary and/or secondary data. Consistent with the Agency's Quality Assurance (QA) requirements, the contractor must prepare a complete Project Specific Quality Assurance Project Plan (PQAPP), to assure the quality of the data used under this WA. Work on these tasks cannot proceed until the contractor receives notification of PQAPP approval from the Contract Level Contracting Officers Representative (CL-COR) via email. The QA requirements must be addressed in the monthly progress reports as specified under Task 0 below.

Additional information on the PQAPP is described in the Task 1.

**D. Background:**

The Underground Injection Control (UIC) program has collected national aquifer exemption data in Environmental Protection Agency (EPA) Headquarters. The UIC program requirements are found in the Code of Federal Regulations (CFR) at 40 CFR Parts 144, 146 and 148. The requirements of concern in this work assignment are requests for aquifer exemptions and the supporting underlying data. An aquifer exemption is an aquifer or a portion thereof which meets the criteria for an "underground source of drinking water" (USDW) as laid out in 40 CFR 146.3 and may be determined under 40 CFR 144.7 to be an exempted aquifer if it meets the criteria of 40 CFR 146.4 (a), (b), (c) and (d). Briefly, in order for aquifers (USDWs) to be removed from UIC program protection, they must not serve as a drinking water source now or in the future based on criteria listed in 40 CFR 146.4 (a), (b) 1-4, and (c); the total dissolved solids must be greater than 3,000 and less than 10,000 mg/L; and the aquifer is not reasonably expected to supply a public water system. Most aquifer exemption requests are usually

associated with an injection well permit and are considered a UIC program revision. Aquifer exemption requests are generally managed at the EPA regional and state level, however, there are instances where EPA Headquarters gets involved in the process, namely because some aquifer exemption requests are considered major program revisions. Owners/operators (o/o) of injection wells wishing to exempt underground sources of drinking water (USDW) for purposes associated with underground injection projects may submit an aquifer exemption request or application to the regulatory agency for review. If the regulatory agency is a delegated state UIC program, it can review the application and make a determination that it is technically sound and submit its recommendation for approval to EPA. Only EPA can approve aquifer exemptions. In the case of a Direct Implementation state (States without the UIC program delegation are run by EPA Regions.), the o/o submits the aquifer exemption application directly to the EPA region for review and approval.

## **II. OBJECTIVE:**

EPA maintains aquifer exemptions data at Headquarters. The contractor shall provide technical support to EPA for the Aquifer Exemption Data Initiative to update the current aquifer exemptions dataset with new information. Technical support may include collecting aquifer exemption data from the EPA Regions, communicating with the EPA Regions to ensure accurate interpretation of the data, performing quality control/assurance procedures, and finalizing the aquifer exemption data in an Excel spreadsheet and geospatial information system (GIS) file. Additionally, the contractor shall provide documentation of methodology and decisions as well as metadata for the geospatial data.

The contractor shall provide technical and general support per technical direction only from the WACOR or alternate WACOR for the Aquifer Exemption Data Initiative.

This work will be completed commensurate with Sections 2.2, 2.3, 4.3, 6.1, 6.2, 6.3, and 7.4 of the Contract Level PWS. The level of effort estimated for this work assignment is 598 hours.

## **III. TASK DETAIL:**

The contractor shall perform the following tasks:

### **Task 0 – Work Plan, Weekly Conference Calls, and Monthly Progress Reports Submission**

In accordance with contract requirements, the contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, and the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. For planning purposes, the work plan shall include the requirement that all electronic and information technology (EIT) and all EIT deliverables that will be publicly released be Section 508 compliant in accordance with the policies referenced at <http://www.epa.gov/accessibility>. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the contractor shall include information on plans to manage work and contract costs.

Weekly conference calls between the WACOR and contractors are expected to communicate work progress and address any challenges that arise. For planning purposes, no more than two (2) contractor staff should attend the weekly conference calls. Weekly calls are expected to be no more than one (1) hour in duration.

This task also includes monthly progress and financial reports. The monthly progress report shall indicate, in a separate QA section, whether significant QA issues have been identified and how they are being resolved. Monthly financial reports must include a table with the invoice LOE and costs broken out by the tasks in the WA.

Deliverables: Work plan and monthly progress and financial reports

### **Task 1 – Project-Specific Quality Assurance Project Plan**

Tasks in this WA 3-70 are a continuation of work conducted under WA 0-70, WA 1-70, and WA 2-70. The contractor shall update, as needed, the existing PQAPP completed under WA 0-70, as noted in section C Quality Assurance, and ensure the quality of secondary data used to complete these tasks. The PQAPP should reflect the QA procedures that the contractor shall take to assure project quality. The contractor shall write the PQAPP using the active voice. The text of the PQAPP must explicitly reference tools that the contractor shall use to document and review reproducibility and traceability, such as standard operating procedures, check lists, and guidelines. The PQAPP must include the tools as attachments for EPA's review and approval. The contractor shall perform work under this performance work statement in a manner consistent with the PQAPP. In addition, the contractor shall document relevant QA activities in any deliverable.

Quality assurance and metadata support for geospatial files should adhere to EPA approved geospatial procedures and standards found at <https://www.epa.gov/geospatial/geospatial-policies-and-standards>.

Deliverable: PQAPP

### **Task 2 – Data Update and Quality Assurance**

The contractor shall add aquifer exemption data collected from the EPA Regions to a spreadsheet, communicate with Regional staff to ensure accurate interpretation of the data, perform quality control/assurance procedures, update the appropriate quality assurance (QA) fields in the spreadsheet, and finalize the aquifer exemption spreadsheet. The aquifer exemption spreadsheet includes approximately four thousand (4,000) rows of data with around twenty (20) data fields. The WACOR will provide the contractor with a current version of the data. The information provided to the contractor by the WACOR may be in hardcopy maps, Excel spreadsheets, Access databases, or portable data file (PDF) format.

New data may come from multiple EPA Regions. California and EPA Region 8 have both existing and new aquifer exemptions that will need to be updated. We expect an especially large number of aquifer exemption data to come from Region 6 where the Texas Railroad Commission is improving its records on aquifer exemptions approved at program primacy. It may be necessary to work with Commission staff to prioritize the records added to the

aquifer exemption spreadsheet. Prioritization may be based on the number of injection wells within the aquifer exemption boundaries. The data or a portion of the data may already be in spreadsheet format, which would require the contractor to assess the data quality and incorporate the data into the existing EPA geospatial and spreadsheet files. For planning purposes, the contractor shall assume new data for up to three thousand (3,000) approved aquifer exemptions and an update to data for up to five hundred (500) existing records for the WA period.

Any data that do not meet acceptance criteria prescribed by the PQAPP shall be identified to the WACOR in a memorandum with an explanation of the quality issue. For planning purposes, up to ten (10) memorandums describing data quality issues and either proposed or actual resolution of the issues may be needed. Resolution may include changes to database structure that improve communications, exclusion of data that does not meet quality criteria described in the PQAPP, or corrections to data elements. It may be necessary for the contractor, upon request from the WACOR, to contact specific EPA Regional staff to clarify or update some data in order to meet quality acceptance criteria.

The contractor shall provide the WACOR with draft versions of the spreadsheet, as needed, in order to facilitate decisions about data management and clarifications requested of Regional staff. After QA processes conclude, the contractor shall provide the WACOR with a final version of the spreadsheet that includes the updated aquifer exemptions data. The deliverable date for final data will be dependent on the work needed to correct any issues. For planning purposes, final data will be due between two (2) weeks and one (1) month after WACOR comments are provided on draft data.

Deliverables: QA issue memorandums, draft and final versions of datasets

### **Task 3 – Geospatial File Development**

Geospatial file development will proceed concurrently with updates to the aquifer exemption spreadsheet described in Task 2. The contractor shall pair selected data elements from the spreadsheet with point and polygon locations for the exempted aquifers developed in Environmental Systems Research Institute (ESRI) ArcGIS 10.4 or higher. The contractor shall identify whether individual records meet QA criteria using flag fields. The contractor shall provide the WACOR with a subset of the data that meets QA criteria; rows with insufficient, inaccurate, contradictory, or otherwise invalid location information will be excluded. The subset of data will include identifying information for each exempted aquifer; locational information such as county, state, tribe, latitude and longitude of the centroid for each exempted aquifer; the injection well class associated with the aquifer exemption; the exemption area; depth of the exempted aquifer; lithology; approval date; and injectate characteristics. The subset of data shall be appropriate for separate analysis in ESRI ArcGIS 10.4 or higher.

The contractor shall develop a script able to draw boundaries for descriptions of the exempted aquifers in Public Land Survey System (PLSS) format, and a user guide with directions for creating polygons with the script. EPA is aware that a portion of the aquifer exemption locational data may be described in PLSS format or a highly detailed version of

PLSS format, e.g. 100 feet from the southern boundary of a specific township, range, and section. For planning purposes, approximately five hundred (500) aquifer exemptions may have descriptions that require a script to develop the polygon boundary. The script should undergo appropriate quality control/assurance processes to ensure that polygon boundaries accurately portray the location of the aquifer exemption boundary.

Aquifer exemption locations from the Texas Railroad Commission will likely be supplied in hardcopy maps, map images on CD-ROM, or geodatabases. It may be necessary to purchase the maps from the University of Texas Bureau of Economic Geology. The data or a portion of the data may already be in geospatial files, which would require the contractor to assess the data quality and incorporate the data into the existing EPA geospatial and spreadsheet files. For planning purposes, the contractor shall assume new data for up to three thousand (3,000) approved aquifer exemptions. It may be necessary to work with Commission staff to prioritize the records added to the aquifer exemption spreadsheet. Prioritization may be based on the number of injection wells within the aquifer exemption boundaries.

Geospatial data will be displayed on the EPA's Geoplatform. Online publication of maps should leverage the Geoplatform technical architecture (hardware and software) to the fullest extent possible for public search and discovery. The contractor shall upload data to the Geoplatform and prepare the map layers and application for public release. The contractor shall follow Geoplatform policies and publication procedures. The OW geospatial administrator and communications director must approve all new maps hosted on the Geoplatform prior to production release.

The contractor shall prepare metadata for the geospatial file using the EPA Metadata Editor (EME). (EME; for more information on the EPA Metadata Editor, please see <https://edg.epa.gov/metadata/catalog/main/home.page>.) For planning purposes, the data file destined for the EPA Geoplatform will include up to fifteen data fields and up to five thousand (5,000) rows of data. All fields will be completed to the contractor's best knowledge with input from the WACOR, including optional fields. The final metadata will be validated using EME's validation tool and provided in XML and HTML formats. All geospatial metadata will be published in EPA's Environmental Data Gateway, which serves Data.gov as an Office of Management and Budget (OMB) requirement. Information on metadata and the Environmental Data Gateway may be found at <https://edg.epa.gov/metadata/catalog/main/home.page>.

Deliverables: geospatial file; metadata for geospatial file

#### **Task 4 – Communication Materials**

The contractor shall convert up to ten (10) individual communication materials to be 508 compliant upon request by the WACOR. For planning purposes, the materials may include fact sheets (up to three pages each), graphic files in JPG or PDF format such as maps, or text documents (up to ten pages each).

Deliverables: 508-compliant documents

#### **IV. Schedule of Deliverables:**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
0	Work Plan	Within fifteen (15) calendar days of receipt of work assignment
	Monthly progress and financial reports	Monthly
	Conference call to discuss project progress	Weekly
1	PQAPP update	Within fifteen (15) days of issuance of work assignment
2	Data quality issue memorandums	As requested by WACOR
	Draft dataset	As requested by WACOR
	Final dataset	By December 31, 2018
3	Geospatial File	By January 10, 2019
	Metadata for geospatial dataset	By January 10, 2019
4	508-compliant documents	As requested by WACOR

#### **V. Miscellaneous**

##### **Software Application Files and Accessibility**

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See: <http://www.section508.gov/>

Preferred text format:	MS Word, 8.0 or higher (Office 2003 or higher)
Preferred presentation format:	Power Point, Office 2003 or higher
Preferred graphics format:	Each graphic is an individual GIF file
Preferred portable format:	Adobe Acrobat, version 6.0
Preferred GIS format:	ESRI ArcGIS, version 10.4 or higher

#### **VI. Travel**

The contractor should anticipate only local travel, if necessary, in support of this WA over the duration of the performance period.

#### **VII. Meetings, Conferences, Training Events, Award Ceremonies, and Receptions**

All appropriate clearances and approvals required by Agency policy in support of any and all conference related activities and expenses, including support of meetings, conferences, training events, award ceremonies and receptions, including the form 5170 for all meetings costing more than \$20,000, shall be obtained by the EPA CL-COR as needed and provided to the Contracting Officer (CO). Work under conference related activities and expenses shall not occur until this approval is obtained and provided by the EPA CL-COR.

### **VIII. Contractor Identification**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the CO, CL-COR and/or WACOR.

### **IX. Printing**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

### **X. Quality Assurance Surveillance Plan**

All task(s) identified in the performance work statement above are subject to review and approval by the WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, schedule, and document development standards.



<b>Performance Requirement</b>	<b>Measureable Performance Standards</b>	<b>Surveillance Methods</b>	<b>Incentives/Disincentives</b>
<u>Programmatic Standard:</u> Outputs are based on best available information and resources; Documentation of sources used, not used, and limitations of available data; Description of methodological choices made both conceptually and in data selection. Assumptions utilized in environmental planning and applying engineering principles are clearly documented.	No more than 15% of deliverables and work products for any WA furnished to EPA for review by CLCOR/WACOR and QAO shall require revisions to meet the requirements of the QMP and QAPP for the WA.	EPA will review all products for conformance with the requirements of the SDWA Amendments, Clean Water Act and other related mandates, including Small Business Regulatory Enforcement Fairness Act 1996 (SBREFA) and Unfunded Mandates Reform Act of 1995 (UMRA).	<p>Two or more work assignments per contract period where the contractor does not meet the measureable performance standard will be considered unsatisfactory performance and will be reported as such in the CPARS Performance Evaluation System under the category of Management.</p> <p>Fewer than two work assignments per contract period where the contractor does not meet the measureable performance standard will be considered satisfactory performance and will be reported as such in the CPARS Performance Evaluation System under the category of Management.</p>
<u>Cost Control Standard:</u> Implementation of cost control system to monitor and track project status, that indicate level of budget utilized and forecast remaining budget	The contractor shall manage costs to the level of the approved ceiling on each individual WA. The contractor shall notify the EPA WACOR, CL COR, and CO when 75% of the approved funding	The EPA CLCOR will routinely discuss the work progress and contract level and individual task expenditures with the Project Manager. The WACOR will maintain regular contact with	If the contractor does not meet the measurable performance standards per contract period it will be assigned a rating of Unsatisfactory in CPARS under the category of Cost Control.

<b>Performance Requirement</b>	<b>Measureable Performance Standards</b>	<b>Surveillance Methods</b>	<b>Incentives/Disincentives</b>
needs to complete project. The contractor shall notify project COR immediately in cases where issues impact project cost are identified. The contractor shall provide a risk management strategy that identifies specific project element(s) that adversely impact proposed work plan. The risk management strategy shall present impacts if course is continued without mitigation, and solutions to resolve the issue(s). The Risk Management Strategy shall consider process, schedule, prioritization, and cost benefit analysis.	ceiling for any particular WA is reached. If a contractor fails to manage and control cost, any resultant overrun cannot exceed the total contract obligation for that period.	the Contractor's designated task order manager/project manager to discuss task progress and expenditures and will review and verify expenditures and technical progress before invoice payments are authorized.	A satisfactory rating will be reported in the CPARS Performance Evaluation System under the category of Cost Control if the contractor meets the measureable performance standards and accurately reports the costs in the progress reports according to the requirements in the "Reports of Work" attachment to the contract.
<u>Schedule Standard:</u> Services and deliverables shall be in accordance with schedules stated in each task order. Unless amended or modified by an approved EPA action, a deliverable that is received 7-days past the due date, will be considered unsatisfactory performance.	No more than 15% of all deliverables per WA shall be submitted more than 3 work days past the due date.	EPA will closely monitor task milestone and deliverable schedules and review the Contract Monthly Progress Reports and any special reporting requirements to compare actual delivery dates to those approved in task. EPA will notify the contractor when it becomes apparent that an established schedule will not be met.	If the contractor does not meet the measurable performance standards per WA it will be assigned a rating of Unsatisfactory in CPARS under the category of Schedule.  A satisfactory rating will be reported in the CPARS Performance Evaluation System under the category of

<b>Performance Requirement</b>	<b>Measureable Performance Standards</b>	<b>Surveillance Methods</b>	<b>Incentives/Disincentives</b>
			Schedule if the contractor meets the measureable performance standards.
<u>Document Development:</u> Documents shall be technically and factually accurate, and suited to the intended audience. The draft version of a document shall meet a standard of no more than 2 typographical and/or grammatical errors per page and require no more than two editorial revisions. Final documents must meet a standard of no more than 2 typographical and/or grammatical errors per document.	No more than 15% of deliverables and work products for any WA furnished to EPA for review by CLCOR/WACOR and QAO shall require revisions to meet the requirements of the QMP and QAPP for the WA.	The WACOR will review drafts to assess technical accuracy and editorial quality. The WACOR will identify all inaccuracies and needed edits and corrections to the Contractor in the initial review of draft documents	If the contractor does not meet the measurable performance standards per work assignment it will be assigned a rating of Unsatisfactory in CPARS under the category of Quality.  A satisfactory rating will be reported in the CPARS Performance Evaluation System under the category of Quality if the contractor meets the measureable performance standards.

<b>EPA</b> United States Environmental Protection Agency Washington, DC 20460 <b>Work Assignment</b>						Work Assignment Number 3-89				
						<input type="checkbox"/> Other <input type="checkbox"/> Amendment Number:				
Contract Number EP-C-15-022			Contract Period   09/01/2015   To   06/30/2019 Base                      Option Period Number       3			Title of Work Assignment/SF Site Name Reg 2 VIDPNR Support				
Contractor Cadmus Group LLC, The					Specify Section and paragraph of Contract SOW 1.5, 3.4, 7.0, 8.1					
Purpose: <input checked="" type="checkbox"/> Work Assignment <input type="checkbox"/> Work Assignment Close-Out <input type="checkbox"/> Work Assignment Amendment <input type="checkbox"/> Incremental Funding <input type="checkbox"/> Work Plan Approval					Period of Performance  From   02/19/2019   To   06/30/2019					
Comments: Immediate start is authorized for this work assignment										
<input type="checkbox"/> Superfund                      Accounting and Appropriations Data <input checked="" type="checkbox"/> Non-Superfund										
SFO <input type="checkbox"/> Note: To report additional accounting and appropriations date use EPA Form 1900-69A. (Max 2)										
Line	DCN (Max 6)	Budget/FY (Max 4)	Appropriation Code (Max 6)	Budget Org/Code (Max 7)	Program Element (Max 9)	Object Class (Max 4)	Amount (Dollars)	(Cents)	Site/Project (Max 8)	Cost Org/Code
1										
2										
3										
4										
5										
Authorized Work Assignment Ceiling										
Contract Period:		Cost/Fee:		LOE:						
09/01/2015   To   06/30/2019				0						
This Action:				120						
Total:				120						
Work Plan / Cost Estimate Approvals										
Contractor WP Dated:				Cost/Fee		LOE:				
Cumulative Approved:				Cost/Fee		LOE:				
Work Assignment Manager Name   Mark Rasso  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 212-637-3839 FAX Number:				
Project Officer Name   Nancy Parrotta  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 202-564-5260 FAX Number:				
Other Agency Official Name   Lisa Mitchell-Flinn  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2852 FAX Number:				
Contracting Official Name   Angela Lower  <div style="display: flex; justify-content: space-between;"> <div>_____ (Signature)</div> <div>_____ (Date)</div> </div>						Branch/Mail Code: Phone Number: 513-487-2036 FAX Number:				

## **PERFORMANCE WORK STATEMENT**

**Cadmus EP-C-15-022**

**Work Assignment No. 3-89,**

**(Issuance – June 30, 2019)**

**I. ADMINISTRATIVE:** These tasks are authorized by the Contract Level Performance Work Statement sections 1.5, 3.4, 7.0, and 8.1, LOE:120 hours

**A. Title: US Virgin Islands Department of Planning and Natural Resources (VIDPNR) Revised Total Coliform Rule (RTCR) Primacy Package and Training Support**

**B. Work Assignment Contracting Officer's Representative (WACOR)**

Mark Rasso

Drinking Water Branch

U.S. Environmental Protection Agency (EPA)

290 Broadway

NY, NY 10007

Phone: 212-637-3839

Email: [rasso.mark@epa.gov](mailto:rasso.mark@epa.gov)

**C. Background:**

The purpose of this requirement is to provide technical support for implementation of the Safe Drinking Water Act (SDWA). The SDWA mandates that the US Virgin Islands establish state drinking water standards for public water systems to ensure water supplied to the public is safe to drink. These standards are implemented through the Public Water System Supervision (PWSS) Program. The Act envisions joint federal/state programs to assure compliance with these regulatory requirements. The State take a leading role in the primary enforcement responsibility (primacy) for PWSS programs.

This Performance Work Statement (PWS) identifies contract support required. In addition, each work assignment will: 1) present critical milestones, schedules, and specify work products; 2) describe project specific quality assurance and travel requirements; and 3) identify contacts and other resources that will assist the contractor in accomplishing the work.

**II. OBJECTIVE:**

The objective of this work assignment is to assist and provide technical support to the US Virgin Islands Department of Planning and Natural Resources (VIDPNR) to develop the primacy application package for the SDWA Revised Total Coliform Rule (RTCR), and once primacy is achieved, to conduct trainings for US Virgin Islands' PWS owners/operators and state staff on the rule requirements.

### **III. TASK DETAIL:**

The contractor shall perform the following tasks:

#### **Task 0 – Work Plan Submission**

The Contractor shall develop a work plan that describes how each task will be carried out. The work plan shall include a schedule, staffing plan, level of effort (LOE), and cost estimate for each task, the contractor's key assumptions on which staffing plan and budget are based, and qualifications of proposed staff. If a subcontractor(s) is proposed and subcontractors are outside the local metropolitan area, the contractor shall include information on plans to manage work and contract costs.

This task also includes quarterly progress reports and monthly financial reports. Monthly financial reports shall be submitted per contract reporting requirements and must include a table with the invoice LOE and cost broken out by the tasks in this WA. The quarterly progress report shall indicate the status of development of the primacy application package, whether significant issues have been identified and how they are being resolved. The contractor shall immediately notify the Contract Level Contracting Officer Representative (CLCOR) and Work Assignment Contracting Officer Representative (WACOR) if any changes to the tasks involving.

The tasks under this work assignment do not require the acquisition of "off-site" facilities for conferences and meetings as defined in the IPN 12-05 and the events associated with this work assignment are not covered by EPA Order 1900.3 and do not require EPA Form 5170.

The Contractor shall immediately alert the WACOR to any anticipated event under the work assignment which may result in incurring an estimated \$20,000 or more cost, funded by EPA, specific to that event, meeting, training, etc. Those costs would include travel of both prime and consultant personnel, planning and facilitation costs, etc. The EPA WACOR will then prepare approval internal paperwork for the event and will advise the contractor when appropriate signatures have been obtained. At that point, effort can proceed for the event.

Deliverables: Work plan and quarterly progress reports and monthly financial reports.

#### **Task 1 – Develop RTCR Primacy Application Package for VIDPNR**

The Contractor shall assist the VIDPNR to develop a comprehensive primacy application package for the RTCR required under the SDWA Amendments of 1996. This package includes amendments for the development of regulations to control the usage of materials in all rainwater catchment systems in the USVI and regulations for local water hauling activities. The contractor shall refer to the Revised Total Coliform Rule (RTCR) State Implementation Guidance—Interim Final, EPA 816-R-14-004; December 2014 to develop the primacy application package. The appendices of the USVI's RTCR State Implementation Guidance provide guidelines and baseline information that the contractor can follow throughout the primacy application process, to ensure consistency with the territory's regulatory requirements.

The Contractor shall plan for a minimum of two planning conference calls to discuss gather information needed to compile and complete the primacy application materials, including for example, identifying the current status of the RTCR in the USVI.

The primacy application package includes:

- RTCR language adopted by the USVI
- Attorney General’s (AG) Statement of Enforceability (carried out by the VIDPNR)
- The State Primacy Revision Checklist
- Primacy Revision Crosswalk
- State Reporting and Recordkeeping Checklists
- Special Primacy Requirements

Deliverables: Draft and final completed primacy application packages.

## **Task 2 – Conduct training on the USVI’s adopted RTCR**

Once primacy of the RTCR is obtained, the Contractor shall conduct two one-day (minimum) training courses, one in St. Croix and one in St. Thomas, on the USVI’s RTCR, including Level 1 and Level 2 assessments. EPA anticipates that the Contractor will develop or update existing training slides for student manuals. The Contractor shall plan for a minimum of two planning conference calls to discuss topics, logistics, and sharing of presentation duties. The purpose of the training is to assist VIDPNR staff and owners/operators of public water systems to adopt sustainable management practices for implementing the primacy of the RTCR, as required by the PWSS program to ensure effective implementation of drinking water standards and support the highest possible rate of compliance with those standards and requirements.

Deliverables: Draft and final training materials (e.g. presentations, student manuals) and providing two training courses.

## **IV. SCHEDULE OF DELIVERABLES:**

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
<b>0</b>	<b>Work Plan and Budget</b>	According to contract
	Quarterly progress reports and monthly financial reports	According to contract
<b>1.</b>	<b>Develop Revised Total Coliform Rule (RTCR) Primacy Package</b>	
	Minimum of 2 planning calls	Dates to be decided, but within 3 weeks of approval of this contract
	Draft primacy package	According to timeline agreed upon during planning calls

<b>TASK No.</b>	<b>DELIVERABLE</b>	<b>DATE DUE TO EPA</b>
	Review of primacy package response comments from VIDPNR	Within 4 weeks of receipt of comments/request for revisions
	Finalize and submit primacy package application to EPA	
	Review and address primacy package application response comments from reviewers	As requested; response due within 2 weeks of EPA request to review
<b>2.</b>	<b>Conduct training on the RTCR for USVI's PWSs and state staff</b>	
	Minimum of 2 planning calls	Within 3 months of EPA Region 2 publishing notice of VIDPNR's primacy in the Federal Register.
	One-day (minimum) training in St. Thomas	Within 6 months of the most recent planning call. The trainings will be conducted the same week.
	One-day (minimum) training in St. Croix	

## **V. MISCELLANEOUS**

### **Software Application Files and Accessibility**

Software Application files, if delivered to the Government, shall conform to the requirements relating to accessibility as detailed to the 1998 amendments to the Rehabilitation Act, particularly, but not limited to, § 1194.21 Software applications and operating systems and § 1194.22 Web-based intranet and internet information and applications. See:

<http://www.section508.gov/>

Preferred text format: MS Word, Office 2003 or higher

Preferred presentation format: MS Power Point, Office 2003 or higher

Preferred graphics format: Each graphic is an individual GIF file

Preferred portable format: Adobe Acrobat, version 6.0

## **TRAVEL**

Non-local travel (to the US VI) is anticipated for Task 2 of this work assignment following appropriate approval of the work assignment CLCOR. Any travel will be allowable only in accordance with the limitation of FAR 31.205-43 and FAR 31.205-46, and must be approved by the appropriate EPA CLCOR prior to travel taking place.

## **CONTRACTOR IDENTIFICATION**

Contractor personnel shall always identify themselves as contractor employees by name and organization and physically display that information through an identification badge. Contractor personnel are prohibited from acting as the Agency's official representative. The contractor shall



refer any questions relating to the interpretation of EPA policy, guidance, or regulation to the Contracting Officer (CO), CLCOR and/or WACOR.

## **PRINTING**

All copying and printing shall be accomplished within the limitations of the printing clause of the contract.

## **VI. Quality Assurance Surveillance Plan**

All task(s) identified in the performance work statement above are subject to review and approval by the EPA WACOR based on the general guidelines of the contract quality assurance surveillance plan regarding: Programmatic, cost control, schedule, and document development standards.